

PL-10	10/07/2019	Invoice # 38269		
PL-11	12/30/2019	Invoice # 38251		
PL-12	12/16/2019	Invoice # 38193		
PL-13	12/23/2019	Invoice # 38280		
PL-14	01/15/2020	Invoice # 38340		
PL-15	On or about August 2019	Letter Agreement Regarding Amounts Owed		
PL-16	Around March 3, 2020	Email Between Parties		
PL-17	January 30, 2023	Defendants' Disclosures		
PL-18	July 13, 2023	Balance Calculation		
PL-19	August, 2019	Letter Agreement as to Amounts Owed with Further Breakdowns		
PL-20	07/13/2023	JB International Register Quick Report for Amounts due 7/26/2019 to 07/13/2023		
PL-21	03/17/2022	J. Birnbach Accounts Receivable Detain Report for William Noble		
PL-22		Open Memos with William Noble		
PL-23	September 1, 2022 – December 1, 2023	Attorney's Fees Invoices (will be supplemented at trial)		

Plaintiff reserves the right to introduce any exhibits designated by the Defendants and any exhibits necessary for rebuttal. Further, to the fullest extent allowed, Plaintiff reserves the right to supplement, amend, or edit this Pre-trial disclosure as such may become necessary and will do so as promptly as possible. Additionally, Plaintiff reserves the right to offer any exhibits produced by any party to this litigation or attached to any pleading or discovery product in this case.

Dated: December 18, 2023

Respectfully Submitted,

PADFIELD & STOUT, L.L.P.

420 Throckmorton Street, Suite 1210
Fort Worth, Texas 76102
(817) 338-1616 - Telephone
(817) 338-1610 - Facsimile

/s/ Brandon J. Gibbons

Mark W. Stout

State Bar I.D. #24008096

mstout@padfieldstout.com

Brandon J. Gibbons

State Bar I.D. #24082516

bgibbons@padfieldstout.com

Local Counsel for Plaintiff

KAMINSKI LAW, PLLC

/s/ Shanna M. Kaminski

By: Shanna M. Kaminski

MI Bar No. P74013

P.O. Box. 725220

Berkley, MI 48072

(248) 462-7111

skaminski@kaminskilawpllc.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been forwarded to the counsel of record via e-service on December 18, 2023.

/s/ Brandon J. Gibbons

Brandon J. Gibbons